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*Attorneys for HSBC Bank USA, N.A., as Trustee for
 Wells Fargo Home Equity Asset-Backed Certificates,
 Series 2006-3, by its Attorney-in-fact Wells Fargo
 Bank, N.A., Wells Fargo Bank, N.A., and Wells
 Fargo Asset Securities Corporation*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

Plaintiff,

vs.

HSBC BANK USA, N.A., as trustee for
 WELLS FARGO HOME EQUITY
 ASSET-BACKED CERTIFICATES, Series
 2006-3, by its Attorney-in-fact WELLS
 FARGO BANK, N.A.; WELLS FARGO
 BANK, N.A.; and WELLS FARGO
 ASSET SECURITIES CORPORATION,

Defendants.

Case No. 2:17-cv-01514-JCM-NJK

**STIPULATION AND ORDER TO
 EXTEND BRIEFING SCHEDULE ON
 PLAINTIFF'S RULE 37(c) MOTION
 [ECF No. 160]**

(FIRST REQUEST)

Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed
 Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A.; Wells Fargo Bank,
 N.A.; and Wells Fargo Asset Securities Corporation (collectively, "Wells Fargo"), and Plaintiff
 Edyta Gryglak ("Plaintiff" and together with Wells Fargo, the "Parties") hereby file the following
 stipulation to extend the briefing schedule for Plaintiff's "Rule 37(c) Motion to Confirm That Her
 Inadvertent Failure to File a Rule 26(A) Initial Disclosure Was Harmless" ("Rule 37(c) Motion")

(ECF No. 160), to synchronize it with the summary judgment briefing schedule that this Court has approved (ECF No. 155):

1. On May 28, 2021, Wells Fargo filed its Renewed Summary Judgment Motion (ECF No. 151), pursuant to a May 24, 2021 stipulation and order (ECF 150).

2. Pursuant to the July 6, 2021 stipulation granted by this Court, an extended, unified briefing schedule was created for both the Renewed Summary Judgment Motion and Plaintiff's own summary judgment motion on the issue of damages (the "Gryglak Summary Judgment Motion") (ECF No. 154):

a. **July 8, 2021:** the deadline for Plaintiff to file the Gryglak Summary Judgment Motion and her response to Wells Fargo's Renewed Summary Judgment Motion

b. **August 9, 2021:** the deadline for Wells Fargo's response to the Gryglak Summary Judgment Motion and its reply in further support of its Renewed Summary Judgment Motion

c. **August 23, 2021:** the deadline for Plaintiff's reply in further support of the Gryglak Summary Judgment Motion

3. Plaintiff timely filed her response to Wells Fargo's Renewed Summary Judgment Motion (ECF No. 156) and the Gryglak Summary Judgment Motion (ECF No. 159).

4. Along with these briefs, Plaintiff contemporaneously filed the Rule 37(c) Motion (ECF No. 160), which exclusively addresses issues raised in Wells Fargo's Renewed Summary Judgment Motion and the Gryglak Summary Judgment Motion.

5. A response to the Rule 37(c) Motion is currently due on July 23, 2021.

6. The Parties therefore agree that it would be efficient to synchronize the briefing schedule for the Rule 37(c) Motion with the schedule for the summary judgment motions.

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7. The Parties THEREFORE STIPULATE that the deadline for Wells Fargo's response to the Rule 37(c) Motion (ECF No. 160) is extended to August 9, 2021, and the deadline for Plaintiff's reply in support of that motion is extended to August 23, 2021.

Dated: July 15, 2021	Dated: July 15, 2021
SNELL & WILMER L.L.P.	THE GRIFFITH FIRM
By: <u>/s/ Kelly H. Dove</u> Amy F. Sorenson, Esq. Kelly H. Dove, Esq. Blakeley E. Griffith, Esq.	By: <u>/s/ Edward Griffith</u> Edward Griffith (<i>pro hac vice</i>) 45 Broadway, Suite 2200 New York, New York 10006 (646) 645-3784 (mobile)
<i>Attorneys for Defendants</i>	<i>Attorney for Plaintiff</i>

ORDER

Good cause appearing, **IT IS HEREBY ORDERED** that the deadline for Wells Fargo's response to the Rule 37(c) Motion (ECF No. 160) is extended to August 9, 2021, and the deadline for Plaintiff's reply in support of that motion is extended to August 23, 2021.

IT IS SO ORDERED.

DATED July 16, 2021


U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2021, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE ON PLAINTIFF'S RULE 37(c) MOTION [ECF No. 160]** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 15th day of July 2021.

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer

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